U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Superior Barrel and Drum - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #26**
Commence T&D Under Subcontract #2
Superior Barrel and Drum

Elk, NJ
Latitude: 39.6930670 Longitude: -75.1345550

To: Keith Glenn, ERRD/RPB/ERT
Sophia Kelley, PAD
Dave Kluesner, EPA
Judith Enck, EPA
Beckett Grealish, USEPA Region 2, ERRD, RAB
Tim Grier, USEPA Headquarters 5202G
Dan Harkay, USEPA, Region 02, ERRD-RAB
Bonnie Hriczko, EPA
Gilberto Irizarry, USEPA Headquarters
Chris Jimenez, US EPA Region II
Delmar Karlen , USEPA Region 2 ORC-NJSFB
Doug Kodama, USEPA Region 2 ERRD
John LaPadula, USEPA, Region 2 ERRD-NYRB
Mary Mears, USEPA, Region 2, PAD
Eric Mosher, USEPA , Region 2, ERRD-RPB
Regional Response Operations Center, EPA
Mark Pane, USEPA, Region 02, ERRD-RAB
George Pavlou, EPA
Lisa Plevin, EPA
Andrew Raddant, Department of Interior
Andrew Raddant, US DOI
Elias Rodriguez, USEPA Region 02, PAD
Joe Rotola, USEPA Region 02
Eric J. Wilson, USEPA, Region 02, ERRD-RAB
George Zachos, USEPA Region 2 ERRD
Margaret Gregor, US EPA
Fred Mumford, NJDEP

From: Keith Glenn, OSC/Environmental Scientist
Date: 3/31/2014
Reporting Period: March 24, 2014 through March 30, 2014

1. Introduction

1.1 Background

Site Number:	A23K	**Contract Number:**	EP-S2-10-01
D.O. Number:		**Action Memo Date:**	11/22/2013
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/30/2013	**Start Date:**	9/27/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:	NJD986630705	**RCRIS ID:**	
ERNS No.:		**State Notification:**	8/29/2013
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

1.1.2 Site Description

On August 29, 2013, the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013, EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Thousands of containers, mostly 275-gallon totes and 55-gallon drums, were observed along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in numerous locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, but most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5-acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the south are private lands which are also densely wooded with several marshy areas. The western boundary is State Route 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is 2.4 acres in size and includes a permanent steel structure with deteriorated machinery. This area would receive containers, rinse the containers, and recondition them for future market. Containers are located throughout this area. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with several trailers holding containers. This area encompasses approximately 0.32 acre of land. Both areas show signs of

impact from leaking containers or dumping of materials.

1.1.2.2 Description of Threat

The facility is located in a federally recognized wetland. Thousands of containers are in various states of deterioration and leaking containers have been noted. Many labels on containers indicate that contents are hazardous substances; however, the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shotgun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots were collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead and many other hazardous substances are present in the containers. Soil samples also showed attribution between the materials in the containers and those in the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Removal of waste under subcontract 2 commenced during the operational period with the T&D of flammable material. Chemists completed the collection of screening samples to be analyzed for VOC and Heavy Metal fractions by the DESA and PHILIS Laboratories. Managers focused on reviewing the screening data received from the labs to formulate criteria for composite sample generation of the N-series waste.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife, and local officials. NJDEP personnel continued weekly visitations. Security personnel continued to patrol the Site during non-operational hours.

2.1.2 Response Actions to Date

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

Crew members focused on preparing materials for shipment. Containers designated for removal under the current subcontract were moved into the warming cells where they were cleaned, labeled, and prepared for removal. Waste profiles were generated, reviewed, and approved for the release of materials to various disposal facilities.

On March 24 – 25, 2014 the Removal Support Section conducted a financial audit of the operational activities. Review of all 1900-55s, Daily Work Orders, and supporting documentation was conducted.

On March 25, 2014 the OSC worked with the Assistant United States Attorney's Office for the return of Warrant #1. This warrant authorized entry and assessment of the site which lead to the issuance of Warrant #2. EPA provided language to be included in the return of the warrant, which was submitted to a Federal Judge Magistrate in Camden, NJ.

A reporter for the South Jersey Times contacted the OSC to schedule a photo session of removal operations. Press will be allowed to view load-out operations in the next period.

On March 27th a total of 151 samples were sent to the Region 2 DESA Lab and OEM PHILIS Laboratory located in Edison, NJ. These represent the last of the screening samples requested for the N-series waste. Managers reviewed the previously received data and generated criteria for creating composite samples. Lists of non-regulated waste have been generating using the screening data which will allow for more efficient disposal of materials.

A total of 17 containers were removed from the site on March 28, 2014. Mostly flammable wastes, these 275-gallon totes were sent to a facility where materials will be used for fuel-blending purposes. Claraint notified EPA they would retrieve their container from the Site on March 31st.

RST continued to provide perimeter and spot air monitoring to ensure the safety of personnel and surrounding properties. Additionally, RST continued to manage the SCRIBE and Response Manager databases.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. To date, no response was received from Thomas Toy. A Notice and Demand Letter was sent to Mr. and Mrs. Thomas Toy on March 14, 2014 requesting payment for removal activities.

Following receipt of the 104(e) information request that EPA sent out to potential arrangers of on-site waste on January 14 and 15, 2014, companies continue to request documents from EPA regarding the containers and/or documents found on-site. Enforcement personnel have been addressing these inquiries.

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2.1.4 Progress Metrics

Waste Stream	Sub-Class	CompositeSamples Collected	Amount of Containers in Composite
NEUTRAL			
	N1	**1**	**35**
	N2a, b, and c (Composite 44, 45, and 46)	**3**	**106 (35, 35, and 36 respectively)**
	N3a	**1**	**35**
	N3b (Composite 43)	**1**	**35**
	N4	**0**	**-**
	N5a & b (Composite 33 and 34)	**2**	**78 (39 and 39)**
	N6 a, b, c, d, e (solids), f (liquids) (Composites 35, 36, 37, 38, 39, and 40)	**6**	**198 (34, 35, 34, 32, 27, and 36 respectively)**
	N7 (Composite 41	**1**	**20**
	N8 (Composite 42)	**1**	**21**
FLAMMABLE			
	F1a	**1**	**33**
	F1b	**1**	**12**
	F1c	**1**	**11**
	F1d	**1**	**9**

F1e	**1**	**12**
F1f (Liquid Brown)	**1**	**12**
F1g (Liquid Brown)	**1**	**12**
F1h (Liquid Brown on Water)	**1**	**12**
F1i (Liquid Amber)	**1**	**10**
F1j (Liquid Brown)	**1**	**12**
F1k (Misc. Liquid)	**1**	**12**
F1 Grab	**4**	*****
F2a (Powder)	**1**	**10**
F2b (Soil)	**1**	**11**
F2c (Solid Chunks)	**1**	**8**
F2d (Gel)	**1**	**3**
F2e (Misc. Solid)	**1**	**6**
F3a (Sludge Red)	**1**	**12**
F3b (Sludge Browns)	**1**	**12**
F3c (Sludge Browns)	**1**	**12**
F3d (Sludge Browns)	**1**	**10**
F3e (Sludge Browns)	**1**	**11**
F3f (Misc. Sludge)	**1**	**12**
F3 Grab	**1**	*****
F4a (Acid Dark)	**1**	**13**
F4b (Acid Light)	**1**	**5**
F4c (Acid Brown)	**1**	**12**
F4d (Acid Tan)	**1**	**7**
F4e (Acid Sludge)	**1**	**4**
F5a (Base)	**1**	**7**
F6a (Paint Red/Cream)	**1**	**8**
F6b (Paint Blue)	**1**	**12**
F7a (Resin Clear)	**1**	**5**
F7b (Resin Gray Sludge)	**1**	**4**
F7c (Resin Red Sludge)	**1**	**6**
F7d (Resin Black Liquid)	**1**	**4**
F7e (Resin (Gold)	**1**	**3**
F7f (Resin Brown)	**1**	**5**
F7g (Resin Tan)	**1**	**4**
F7h (Resin Multicolor)	**1**	**7**
F7i (Resin White)	**1**	**3**
F7j (Resin Red)	**1**	**2**
F8a (Adhesive Black)	**1**	**3**
F8b (Adhesive Red Orange)	**1**	**3**
F8c (Adhesive Brown)	**1**	**5**
F8d (Adhesive Green Yellow)	**1**	**5**
F8e (Adhesive Tan)	**1**	**2**
F8f (Adhesive Gray Blue)	**1**	**4**
F8g (Adhesive Red Orange)	**1**	**6**
F8h (Adhesive (Green Gray)	**1**	**9**
Composite 24 (Flammable Sludge)	**1**	**11**

	Composite 25 (Flammable Liquid)	**1**	**9**
	Composite 28 (Flammable Paint and Adhesive)	**1**	**9**
	Composite 29 (Flammable Liquid)	**1**	**6**
ACID			
	A1a (pH=4; low viscosity)	**1**	**12**
	A1b (pH=4; high viscosity)	**1**	**10**
	A1c (pH=3)	**1**	**11**
	A1d (Acidic Solids)	**1**	**5**
	A1e (pH=1)	**1**	**3**
	A1f (pH=2)	**1**	**7**
	Grab (difference in properties prevent from bulking)	**11**	*****
	A2a (pH=3-4)	**1**	**11**
	A2b (pH=3-4)	**1**	**12**
	Composite 26 (Flammable Acid)	**1**	**13**
BASE			
	B1a (pH=14)	**1**	**2**
	B1b (pH=14)	**1**	**2**
	B1c (pH=13)	**1**	**2**
	B1d (pH=13)	**1**	**8**
	B1e (pH=12)	**1**	**4**
	B1f (pH=11)	**1**	**7**
	B1g (pH=10)	**1**	**7**
	B1h (pH=10)	**1**	**5**
	B1i (pH=10)	**1**	**7**
	B1j (pH=11)	**1**	**4**
	B1k (pH=11)	**1**	**9**
	B1l (pH=14)	**1**	**3**
	B1m (pH=13)	**1**	**2**
	B1n (pH=13)	**1**	**3**
	B1o (pH=12)	**1**	**4**
	B1p (pH=10)	**1**	**2**
	B1q (pH=10)	**1**	**2**
	B1 Grab (difference in properties prevent from bulking)	**5**	*****
	B2a (Combustible Low Sludge)	**1**	**11**
	B2b (Combustible High Sludge)	**1**	**10**
	B2 Grab (Combustible)	**3**	*****
	Composite 23 (General Base Liquid)	**1**	**12**
	Composite 27 (Flammable Base)	**1**	**9**
COMBUSTIBLE			

Composite 1 (Combustible Organic Liquid with Neutral Liquid, Black/Brown)	**1**	**12**
Composite 2 (Combustible Organic Liquid with Neutral Liquid, Brown)	**1**	**12**
Composite 3 (Combustible Liquid with Neutral Liquid, Brown/Tan/Red)	**1**	**12**
Composite 4 (Combustible Liquid with Neutral Liquid, Black/Brown)	**1**	**12**
Composite 5 (Combustible Organic Liquid with Neutral Liquid, Multicolor)	**1**	**12**
Composite 6 (Combustible Solid, Brown/Multicolor)	**1**	**12**
Composite 7 (Combustible Solid, Black/Brown)	**1**	**12**
Composite 8 (Combustible Liquids and Sludges, Black/Brown/Multicolor)	**1**	**12**
Composite 9 (Combustible Liquids, Black/Brown, Multicolor)	**1**	**12**
Composite 10 (Combustible Liquids, Brown)	**1**	**12**
Composite 11 (Combustible Organic Liquids, Brown/ Multicolor)	**1**	**12**
Composite 12 (Combustible Liquid Mixtures, Brown/ Multicolor)	**1**	**12**
Composite 13 (Combustible Organic Liquid Mixtures, Brown/Multicolor)	**1**	**12**
Composite 14 (Combustible Solids, Black or Brown)	**1**	**12**
Composite 15 (Combustible Solids, Brown/Multicolor)	**1**	**11**
Composite 16 (Combustible Sludges, Brown/Multicolor)	**1**	**12**
Composite 17 (Combustible Solids and Resins, Brown/Multicolor)	**1**	**12**
Composite 18 (Combustible Liquids and Solids, Yellow/Multicolor)	**1**	**12**

	Composite 19 (Combustible Liquid/Solid Mixtures, Black/Brown)	**1**	**9**
	Composite 20 (Combustible Organic Liquids and Sludges, Multicolor)	**1**	**11**
	Composite 32 (Combustible Sludge)	**1**	**9**
OXIDIZER			
	Composite 21 (Oxidizing Solids)	**1**	**11**
	Composite 30 (Oxidizing Organic Liquid on Water)	**1**	**8**
CHLORINATED			
	Composite 23 (Chlorinated / PCB)	**1**	**12**
WATER REACTIVE			
	Composite 31 (Water Reactive)	**1**	**7**

*** Grab samples are collected from one container and are not bulked due to unique features.**

Date Shipped	*Waste Stream*	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
1/30/2014	**Waste Inorganic Liquid**	**Liquid Wastes**	**4,500 gallons (37 containers)**	**012500207**	**Solidification (Proposed)**	**Cumberland County Landfill (Interstate Waste Services), 135 Vaughn Road, Shippensburg, PA 17257**
2/6/2014	**Waste Flammable Solid**	**Solid Wastes**	**982 gallons (7 containers)**	**012500266**	**Incineration (Proposed)**	**Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044**
2/6/2014	**Waste Flammable Corrosive, Acidic Solid**	**Solid Wastes**	**55 gallons (1 container)**	**012500266**	**Incineration (Proposed)**	**Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044**
2/6/2014	**Waste Corrosive, Inorganic, Acidic Liquid**	**Liquid Wastes**	**381 gallons (9 containers)**	**012500266**	**Aqueous Treatment (Proposed)**	**EQ of Detroit, Inc., 1923 Frederick Street, Detroit, MI 48211**
2/6/2014	**Waste Chromium and Lead Contaminated Solid**	**Solid Wastes**	**168 gallons (4 containers)**	**012500266**	**Stabilization/ Landfill (Proposed)**	**Envirosafe Services of Ohio, 876 Otter Creek Road, Oregon, OH 43616**
2/6/2014	**Waste Mercury Contaminated Corrosive,**	**Liquid Wastes**	**165 gallons (3**	**012500266**	**Aqueous Treatment (Proposed)**	**EQ of Detroit, Inc., 1923 Frederick Street,**

	Inorganic, Acidic Liquid		containers)			Detroit, MI 48211
2/6/2014	Waste Corrosive, Acidic Liquid Mixture	Mixed Wastes	92 gallons (2 containers)	012500266	Aqueous Treatment (Proposed)	EQ of Detroit, Inc., 1923 Frederick Street, Detroit, MI 48211
2/6/2014	Waste Corrosive, Organic, Acidic Liquid	Liquid Wastes	55 gallons (1 container)	012500266	Aqueous Treatment (Proposed)	EQ of Detroit, Inc., 1923 Frederick Street, Detroit, MI 48211
2/6/2014	Waste Flammable Liquid and Solid Mixture	Solid Wastes	475 gallons (9 containers)	012500266	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
2/6/2014	Waste Flammable Liquid and Solid Mixture	Mixed Wastes	1,362 gallons (11 containers)	012500266	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
2/20/2014	Waste Corrosive, Inorganic, Basic Liquid	Liquid Wastes	1,509 gallons(13 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464
2/20/2014	Waste Corrosive, Selenium Contaminated, Inorganic, Basic Liquid	Liquid Wastes	190 gallons(2 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464
2/20/2014	Waste Corrosive, Lead Contaminated, Inorganic, Basic Liquid	Liquid Wastes	475 gallons(5 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464
2/20/2014	Waste Corrosive, Lead Selenium Contaminated, Inorganic, Basic Liquid	Liquid Wastes	190 gallons(2 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464
2/20/2014	Waste Corrosive, Chromium Selenium Contaminated, Inorganic, Basic Liquid	Liquid Wastes	1,285 gallons (7 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464

2/20/2014	Selenium Contaminated Liquid	Liquid Wastes	1,285 gallons (7 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464
2/20/2014	Waste Corrosive, Organic, Basic Liquid	Liquid Wastes	285 gallons(3 containers)	12500358	Deep Well Injection(Proposed)	Vickery Environmental, Inc, 3956 State Route 412, Vickery, OH 43464
2/27/2014	Waste Flammable, Chloroform Contaminated	Liquid Wastes	1270 gallons (10 containers)	12500457	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
2/27/2014	Benzene Contaminated Liquid	Liquid Wastes	1840 (9 Containers)	12500457	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
2/27/2014	Waste Corrosive, Organic, Basic Liquid	Liquid Wastes	95 gallons (1 Container)	12500457	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
2/27/2014	Lead Contaminated Liquid	Liquid Wastes	250 gallons (1 container)	12500457	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
2/28/2014	Waste, Flammable Liquid	Liquid Wastes	4700 gallons(24 containers)	11519302	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
3/5/2014	Waste, Flammable Liquid	Liquid Wastes	5000 gallons(55 containers)	11519349	Incineration (Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
3/7/2014	Waste, Flammable Liquid	Liquid Wastes	4,500 gallons(50 containers)	11519380	Incineration(Proposed)	Ross Incineration Services, Inc., 36790 Giles Road, Grafton, OH 44044
3/20/2014	Propane	Liquid Propane	10 cylinders	WO#0472701	Recycling	Suburban Propane, 997 N. Pearl Street, Bridgeton, NJ

						08302
2/28/2014	**Flammable Liquid, Corrosive, UN2924, NOS, 3, II**	**Liquid Waste**	**1250 gallons (4 containers)**	**12224910**	**Fuel Blending**	**Cycle Chem, Inc550 Industrial Drive, Lewisberry, PA 17339**
2/28/2014	**Flammable Liquids, UN1993, NOS, 3, II**	**Liquid Waste**	**1200 gallons(9 containers)**	**12224910**	**Fuel Blending**	**Cycle Chem, Inc550 Industrial Drive, Lewisberry, PA 17339**
3/28/2014	**Flammable Paint Related Materials, UN1263, 3, II**	**Liquid Waste**	**1200 gallons(2 containers)**	**12224910**	**Fuel Blending**	**Cycle Chem, Inc550 Industrial Drive, Lewisberry, PA 17339**
3/28/2014	**Flammable Solids, NOS, 4.1, II Resins, Paint Pigments**	**Solid Waste**	**1250 gallons(2 containers)**	**12224910**	**Fuel Blending**	**Cycle Chem, Inc550 Industrial Drive, Lewisberry, PA 17339**

2.2 Planning Section

2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities of the Superior Barrel and Drum Site.

Transportation and Disposal of wastes will continue in the next operational period. In addition, chemists will focus on the collection of composite samples for the N-series waste. These composite samples will aid in the generation of the next subcontract for disposal.

2.2.1.1 Planned Response Activities

Materials will continue to be removed from the site and be transported to appropriate disposal facilities approved through the OSR process. Additional waste profiles will be generated, reviewed, and approved for the continuance of material disposal.

RST will start to work with the OSCs on generating a comprehensive sampling plan that will have soil, surface water, ground water, and sediment sample points outlined.

Composite samples will be collected from the N-series waste and sent to the laboratory for analysis. This information will be used for generating the next request-for-bids; the removal of remaining waste on-site.

RST will continue to work with EPA on the development of a Common Operational Picture (COP) utilizing FlexViewer. RST personnel will continue perimeter air monitoring.

Additional action items that will be addressed include the propane tanks, container destruction, inspection of potentially buried USTs and drums, and collection of additional multi-media samples.

2.2.2 Issues

No issues to report.

2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, RST personnel or ERRS personnel.

2.4 Finance Section

2.4.1 Narrative

On September 4, 2013, $250,000 was given to the Kemron ERRS contract to perform an emergency removal assessment.

On September 27, 2013, $600,000 was verbally authorized for the commencement of a Removal Action.

On November 22, 2013, the Regional Administrator approved the Action Memorandum documenting the verbal authorization of funding allocation, 12- month exemption, and request for ceiling increase. The Action Memo provides for a total project ceiling of $4,080,000, of which $3,500,000 is for mitigation.

On December 2, 2013, EPA allocated an additional $500,000 to the ERRS contractor for mitigation activities.

On December 24, 2013, EPA allocated an additional $200,000 to the ERRS contractor for mitigation activities.

On February 13, 2014 EPA allocated an additional $250,000 to the ERRS contractor for mitigation activities.

On March 6, 2014 EPA allocated an additional $550,000 to the ERRS contractor for mitigation activities.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Assessment	$250,000.00	$242,978.00	$7,022.00	2.81%
ERRS - Removal Action	$1,990,946.00	$1,441,368.00	$549,578.00	27.60%
START - RV	$250,000.00	$230,045.00	$19,955.00	7.98%
START - RA (Includ CLP)	$350,000.00	$326,457.00	$23,543.00	6.73%
Intramural Costs				
USEPA - Direct	$4,430,000.00	$0.00	$4,430,000.00	100.00%
USEPA - InDirect	$1,445,509.00	$0.00	$1,445,509.00	100.00%
Total Site Costs	$8,716,455.00	$2,240,848.00	$6,475,607.00	74.29%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted.

From October 16 - 18, 2013 a Kemron Industrial Hygienist visited the Site and conducted a health and safety audit. Comments were addressed in the field and a report was generated on November 12, 2013. EPA conducted a health and safety audit on November 5, 2013. All recommendations were addressed following the report generated on November 6, 2013.

2.5.2 Liaison Officer
The OSC is acting Liaison Officer with local, State, and County officials.

2.5.3 Information Officer
Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos if the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

Community Updates were approved by PAD on October 23, 2013 and January 29, 2014. The updates can be found in the Documents section of this website.

On February 27, 2014 the CIC visited the area to distribute fact sheets and meet with local area residents.

3. Participating Entities

3.1 Unified Command
Unified Command is currently not being used.

3.2 Cooperating Agencies
EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

- NJDEP
- Gloucester County HazMat Team and Department of Emergency Response
- Gloucester County Fire Marshal and Fire Department
- Police Department
- Glassboro Water Department
- Elk Township

4. Personnel On Site

EPA (1)
RST Contractors - Weston Solutions (1)
ERRS Contractors - Kemron (8)

5. Definition of Terms

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

CERCLA - Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. Section 9601).

E Goods - Electronic machines which contain hazardous components.

Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

EPA - United States Environmental Protection Agency

ERRS - Emergency and Rapid Response Services contract.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a

discharge, of oil. Required by certain facilities that store and use large quantities of oil.

FWS or **U.S. FWS** - United States Fish and Wildlife Service.

HazCat - Hazardous Categorization, a field technique which utilizes a series of chemical tests on samples collected in the field (aliquots) to determine the characteristics of hazardous and non-hazardous substances. The characteristics which can be determined include matrix (material state), solubility, combustibility, flammability, pH and the presence of oxidizers, peroxides, sulfides, PCB, cyanide.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Monitoring - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

NELAC - National Environmental Laboratory Accreditation Conference.

NJDEP - New Jersey Department of Environmental Protection.

OSC - Federal On-Scene Coordinator.

OSHA - Occupational Safety and Health Administration.

PCBs - Polychlorinated biphenyls, a class of chemical compounds.

PPE - Personal protective equipment.

PRP - Potentially Responsible Party.

RCRA - Resource Conservation and Recovery Act.

REOC - EPA Region II Regional Emergency Operations Center.

RMP - Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

RST - Removal Support Team contract.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

TCE - Trichloroethylene.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional

responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/SuperiorBarrelAndDrum

http://www.epa.gov/region2/superfund/removal/superiorbarrel/

6.2 Reporting Schedule

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates were no longer provided. POLREPS will be generated on Mondays following the end of the operational period.

7. Situational Reference Materials

www.epaosc.org/SuperiorBarrelAndDrum

www.epa.gov/region2/superfund/removal/superiorbarrel/